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14 Attorneys for Plaintiff SHELDON LOCKETT

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 SHELDON LOCKETT,
15
16 Plaintiffs,
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18 v.

18 COUNTY OF LOS ANGELES, a
19 public entity; LOS ANGELES
20 COUNTY SHERIFF'S
21 DEPARTMENT, a law enforcement
22 agency; SHERIFF JIM McDONNELL;
23 MIZRAIN ORREGO, a Deputy Los
24 Angeles County Sheriff; SAMUEL
25 ALDAMA, a Deputy Los Angeles
26 County Sheriff; and DOES 1 through
27 100, inclusive,
28 Defendants.

Case No.: 2:18-cv-5838-PJW

**DECLARATION OF STEVEN C.
GLICKMAN IN SUPPORT OF
PLAINTIFF'S SUPPLEMENTAL
OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT**

Hearing Date: August 19, 2020
Time: 11:00 a.m.
Courtroom: 790
Hon. Patrick J. Walsh

DECLARATION OF STEVEN C. GLICKMAN

I, Steven C. Glickman, declare as follows:

1. I am an attorney admitted to the United States District Court for the Central District of California, and duly licensed to practice law in California. I am a principal at Glickman & Glickman, ALC, co-counsel of record for Plaintiff Sheldon Lockett (“**Plaintiff**”).

2. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief, and as to those, I am informed and believe them to be true. If called as a witness, I could and would testify to the contents of this declaration. I make this declaration in support of Plaintiff’s Supplemental Opposition(s) to Motion(s) for Summary Judgment filed by Defendants County of Los Angeles and the Los Angeles Sheriff’s Department (“**LASD**”) (collectively, “**COLA**”) and Samuel Aldama (“**Aldama**”). All of the depositions referred to below were attended either by me or by my co-counsel John E. Sweeney, also attorney of record for Plaintiff.

3. Attached hereto as **Exhibit “27”** is a true and correct copy of excerpts Vol 1 of the deposition taken in this case of Deputy Austreberto Gonzalez on August 11, 2020. Given the importance of Deputy Gonzalez’ whistleblower testimony and given that the Court was provided with an un-redacted transcript outside of the record, Plaintiff has attached the portions of the condensed transcript with redacting as agreed to by the Court, where the names of any “inked” deputies, other than defendant Aldama, have been redacted. This full transcript was provided in light of the fact the pursuant to Fed. R. Civ. P. 56(c)(3) (“Materials Not Cited. The court need consider only the cited materials, but it may consider other materials in the record.”)

4. Attached hereto as **Exhibit “28”** is a true and correct copy of a photograph attached to the Gonzalez deposition as Exhibit 109, and taken by the deponent, which depicts a Sheriff’s deputy’s computer workstation at the Los

1 Angeles Sheriff's Department Compton station.

2 5. Attached hereto as **Exhibit "29"** is a true and correct copy of
3 Austreberto Gonzalez's government tort claim form against Los Angeles County,
4 dated June 23, 2020 and attached to the deposition of Gonzalez as Exhibit 105.

5 6. Attached hereto as **Exhibit "30"** is a true and correct copy of pages 39-
6 41 of Defendant COLA's Initial Disclosures, as marked up by Deputy Gonzalez, and
7 attached to the deposition of Gonzalez as Exhibit 106.

8 7. Attached hereto as **Exhibit "31"** is a true and correct copy of the
9 declaration of Plaintiff's gunshot residue expert Bryan Burnett.

10 I declare under penalty of perjury under the laws of the United States of
11 America and the State of California that the foregoing is true and correct.

12 Executed this 14th day of August, 2020, at Los Angeles, California.

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14 By /s/ Steven C. Glickman
15 Steven C. Glickman
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